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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Nevada Bell, Pacific Bell and Southwestern )  
Bell Telephone Company Petition for ) CC Docket No. 98-193  
Forbearance of Section 272 of the )  
Communications Act, as Amended to )  
Provide Reverse Directory Services )

COMMENTS OF BELL ATLANTIC<sup>1</sup>

Because the Commission has already addressed the substance of the issues raised in the petition here, it should approve this and other petitions of this type on an expedited basis. When it previously approved BellSouth's petition for forbearance as "consistent with the public interest," the Commission already performed the analysis necessary in order to approve similar petitions from other carriers, including the petition here. *Bell Operating Companies Petitions For Forbearance*, 12 FCC Rcd 2627, ¶ 97 (1998) (BellSouth Forbearance Order). In particular, the Commission found that providing interLATA reverse directory service without a separate subsidiary would promote the public interest because it allows a carrier to avoid "increased costs [and] the consequent charges to consumers." *Id.*, ¶ 73. The Commission also recognized that competition for reverse directory services is already available through the Internet and CD-ROMs and that such competition is likely to

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<sup>1</sup> The Bell Atlantic telephone companies ("Bell Atlantic") are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; Bell Atlantic-West Virginia, Inc.; New York Telephone Company; and New England Telephone and Telegraph Company.

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grow. *Id.*, ¶ 96. Further, the Commission concluded that forbearance would actually “promote competition” by allowing a Bell operating company to offer a more viable service. *Id.*, ¶ 97. All of these generic conclusions are not limited to the specific circumstances of BellSouth’s reverse directory service.

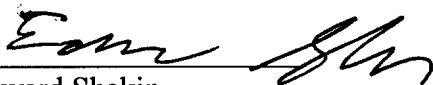
The Commission is currently reconsidering its forbearance condition that a Bell operating company must make listing information from unaffiliated carriers available to third parties. BellSouth Petition for Reconsideration, CC Docket No. 96-149 (filed April 2, 1998). Such sharing may violate contracts with the unaffiliated carriers. Rather than promote competition, such a restriction could inhibit a Bell company’s ability to offer customers a more robust reverse directory service. Regardless, however, SBC has agreed to accept such a restriction as a condition for forbearance (at least until the Commission acts on the pending reconsideration petition). SBC Petition at 1.

As a result, the Commission should treat this petition and any future similar petitions from other Bell operating companies as *pro forma* “me-too” filings. This situation is no different from the introduction of a new switched access service, and the policy justification for expedited treatment for a public interest approval there should dictate similar expedition here. Under the Commissions rules, “after the first incumbent [local exchange carrier has] satisfied the public interest requirement for establishing new rate elements for a new switched access service,” another carrier may file a “me-too” application on an expedited basis, with review within ten days. *Access Charge Reform*, 11 FCC Rcd 21354, ¶ 307 (1996).

### **Conclusion**

The Commission should quickly approve this and other similar me-too petitions seeking 272 forbearance for reverse directory services.

Respectfully submitted,

  
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November 30, 1998

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of November, 1998, a copy of the foregoing Comments of Bell Atlantic was sent by first class mail, postage prepaid, to the parties on the attached list.

A handwritten signature in cursive script, appearing to read "Jennifer L. Hoh", written over a horizontal line.

Jennifer L. Hoh

\* Via hand delivery.

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